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November 23, 2016

VIA ECF
Honorable Lois Bloom
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Bernardo Fleurima, et al., v. City of New York, et al., 15-CV-2616 (AMD) (LB)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York, Police Officer ("P.O.") O'Connor, and P.O. McKenna in the above-referenced matter. Defendants respectfully advise the Court that defendants intend to move for partial summary judgment with respect to plaintiffs' claims.

Pursuant to the Court's Order dated October 14, 2016, requests for a pre-motion conference conforming to Judge Donnelly's Individual Practice Rules must be filed by today. Pursuant to Judge Donnelly's Individual Practice Rules, prior to seeking a pre-motion conference concerning a motion for summary judgment, the parties must exchange statements and counter-statements of undisputed material facts pursuant to Local Civil Rule 56.1. These statements must accompany defendants' request for a pre-motion conference. Defendants need additional time to work with plaintiffs to complete this task before filing their request. Also, defendants expect that it is possible that, upon further discussion, the parties may be able to agree to streamline the claims, such that motion practice could become unnecessary. Accordingly, defendants respectfully request a 30-day extension of the time to file a request for a pre-motion conference. This is defendants' first such request. Defendants have requested plaintiffs' consent to the application, but have not yet received a response. As such, defendants will promptly advise the Court of plaintiffs' position once it is relayed.

Thank you for your consideration herein.

Respectfully submitted,

/s/
Melanie Speight
Senior Counsel

cc: VIA ECF
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